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1           decline, Cary, just so you know.

2           MR. ICHTER: Oh, just --

3           MS. LAROSS: Just in case, huh?

4           MR. ICHTER: Just in case, yeah.

5           MS. LAROSS: Don't expect to change my  
6           mind. Okay. All right, everyone, I would just  
7           like to take a couple of minutes. I think --  
8           Mr. Digges, I think we're done, but let me just  
9           check my notes and make sure we are. So if we  
10          could go off the record just for a couple more  
11          minutes.

12           THE WITNESS: All right. Thank you.

13           MR. ICHTER: Okay.

14           (A short break was taken from 12:13 p.m. to  
15          12:18 p.m.)

16           (Exhibit No. 6, Bullet point sheet, was  
17          marked for identification purposes.)

18 BY MS. LAROSS:

19           Q. Okay. Mr. Digges, could you go ahead and  
20          refresh your exhibits and take a look, if you would, at  
21          Exhibit 6.

22           A. All right. Name's spelled right. Don't mind  
23          my scribble.

24           Q. Sorry. Say it again.

25           A. I said don't mind my scribble.

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1 Q. Okay. All right. So you've had a chance to  
2 look at what's been marked as Exhibit 6?

3 A. Yes, I've been looking at it all -- all day  
4 so far.

5 Q. Okay. So that's the bullet point sheet that  
6 you've referred to during --

7 A. Yeah.

8 Q. -- your deposition in testifying and as well  
9 as a document that you've looked at --

10 A. Yes.

11 Q. -- during your deposition; correct?

12 A. Uh-huh.

13 Q. You'll have to say yes or no.

14 A. Yes. Yes. I'm sorry.

15 Q. Thank you. Thank you. Okay. So I know you  
16 said "don't mind my scribbles," but let me make sure we  
17 know what you mean. So you marked that BMD equals new.  
18 Is that your handwriting there?

19 A. Yes.

20 Q. Okay. And is that something that you -- a  
21 note that you made prior to your deposition?

22 A. Huh? No. Prior to this deposition?

23 Q. I'm sorry. Yes, before -- did you make that  
24 note before --

25 A. Yes. Yes.

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1 Q. -- your deposition?

2 A. Yeah, I just wasn't sure whether -- there's  
3 DRE and BMD, and I just wanted to make sure that I had  
4 a little tickler there to remind me which was which.  
5 That's all.

6 Q. Okay. So then the BMD that you're referring  
7 to, that's the ballot marking devices --

8 A. Yeah.

9 Q. -- used here in Georgia --

10 A. Yeah.

11 Q. -- correct?

12 A. The machines, yeah.

13 Q. Okay. And we've referred to them in your  
14 deposition as the new machines in Georgia; is that --

15 A. Yeah. And that helped, but I just wanted to,  
16 you know, make sure that should the terminology come up  
17 that I understood which ones that we were talking  
18 about.

19 Q. Okay. And then your note where it says  
20 privacy, could you read that note to us?

21 A. Yeah, privacy -- well, the big screens -- and  
22 I don't know if we brought this up, but those big  
23 screens are not very private, you know, in those public  
24 places. And it's possible for other people to see what  
25 you're voting on. And that was another issue. I don't

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1 think I brought it up, but I had it there just in case.  
2 But I didn't remember it, so writing it down was kind  
3 of . . .

4 Q. Okay. So that is another -- when you -- I do  
5 think that, during your deposition, you talked -- you  
6 referred to privacy.

7 A. Yeah.

8 Q. But if -- Go ahead and explain to us what, in  
9 your mind, the privacy issue is.

10 A. Well, they are too large, and they can be  
11 seen by others. That's just -- And that's the only  
12 issue I have is that someone else can see what I'm  
13 voting on.

14 Q. Okay. So have -- But you've never actually  
15 seen the screens yourself; correct?

16 A. I've watched the films and the like of them,  
17 yes.

18 Q. Okay. But you've not stood at the screen  
19 yourself --

20 A. That's correct.

21 Q. -- physically and no personal experience with  
22 the BMDs or the big screens that you refer to; correct?

23 A. That's correct.

24 Q. And then there -- your note also says  
25 about -- it goes on -- and I'd rather have you read it

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1 than have me get it incorrect. It says privacy big  
2 screens and then what does it say after that?

3 A. QR codes -- bar codes. I just wanted to  
4 remember the type of bar code it was.

5 Q. Okay. Is there --

6 A. I didn't want to call it what it wasn't.

7 Q. Okay. And that's what you've referred to as  
8 QR codes in -- during your deposition; correct?

9 A. Yeah. The little square jobbers that we're  
10 using, yeah.

11 Q. Okay. And --

12 A. I had --

13 Q. Sorry. Say that again.

14 A. I had to look it up.

15 Q. Okay. And you looked it up just before your  
16 deposition just to get ready; is that right?

17 A. Yeah. Well, yeah. You don't go to a meeting  
18 unprepared, you know, and so that's just a habit I  
19 have.

20 Q. Okay. And on that document, I -- we have  
21 placed a sticker WD 0006. I want to make sure that  
22 I've not covered up anything on your original; is that  
23 right?

24 A. You didn't.

25 Q. Have I covered up anything or no?

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1 A. No.

2 Q. Okay. And then to the left of the exhibit  
3 sticker, if you could read what your handwritten note  
4 is there.

5 A. Dr. Halderman. I just wanted to remember his  
6 name in case the -- you know, the situation with him,  
7 the testing and all that came up. And I have a little  
8 trouble with names, so I try to . . .

9 Q. Okay. So what's your knowledge of what Dr.  
10 Halderman has done in this case?

11 A. Well, I know he got a hold of, I guess, the  
12 new machines and he tested them and that he found some  
13 issues, and that's about it.

14 Q. Do you have any understanding of what issues  
15 he's found?

16 A. No.

17 Q. And so have you ever reviewed any report that  
18 he's prepared in this case?

19 A. No. Well, previous reports perhaps but not  
20 his latest stuff.

21 Q. Okay. But previous reports during this  
22 litigation or in connection with other --

23 A. When he testified.

24 Q. Excuse me?

25 A. He came in and demonstrated the machines

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1       earlier, the old machines, if you will. He testified,  
2       and, you know, I read some of his stuff then to see  
3       what he was about.

4           Q.     Have you read any report by him since the  
5       time that he testified?

6           A.     No.

7           Q.     And there's a handwritten note below Dr. --  
8       the reference to Dr. Halderman. What does that say?

9           A.     That's not -- That's not associated with Dr.  
10       Halderman. That was just a reminder for me to ask  
11       for -- if you refer to a document, that I should ask  
12       you to see it. And you've done real good there.

13          Q.     Okay. Good. Yeah, it's -- again, we want  
14       you to have a chance to look at documents and I know  
15       that typically --

16          A.     Yeah, I just -- you know, again, there was  
17       some uncertainty before this about what would happen  
18       seeing as how I've never done it, so.

19           MS. LAROSS: Well, you're now finished.

20           That's all that -- Those are all the questions I  
21       have. And Mr. Digges, thank you for your time.  
22       I appreciate it.

23           THE WITNESS: You're welcome. Thank you.

24           MS. LAROSS: You're welcome.

25           MR. ICHTER: You're now a veteran of

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1 litigation.

2 THE WITNESS: Thanks, guys.

3 (The deposition in the above-entitled  
4 matter was concluded at approximately 12:26  
5 p.m.)

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1 C E R T I F I C A T E

2 STATE OF GEORGIA )

3 COUNTY OF FAYETTE )

4 I, CHARLENE M. HANSARD, Certified Court  
5 Reporter, State of Georgia, do hereby certify that  
6 the foregoing pages were reported by me via speech  
7 recognition and reduced to print by me personally or  
8 under my direct supervision and is a true, complete  
9 and correct transcript of the aforesaid proceedings  
10 reported by me.

11 I further certify that I am not a relative,  
12 employee, attorney or counsel of any of the parties;  
13 that I am not a relative or employee of attorney or  
14 counsel for any of said parties; nor am I financially  
15 interested in the outcome of the action.

16 This certification is expressly withdrawn and  
17 denied upon the disassembly or photocopying of the  
18 foregoing transcript, unless said disassembly or  
19 photocopying is done by the undersigned certified  
20 court reporter and original signature and seal is  
21 attached thereto. This the 3rd day of October, 2021.

22 

23 \_\_\_\_\_  
24 CHARLENE M. HANSARD, CCR, CVR-M  
25 Certificate No. B-2341

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1 D I S C L O S U R E

2 I, Charlene M. Hansard, do hereby disclose  
3 pursuant to Article 10.B. of the Rules and  
4 Regulations of the Board of Court Reporting of the  
5 Judicial Council of Georgia that I was contacted by  
6 the party taking the proceedings to provide court  
7 reporting services for this proceeding and there is  
8 no contract that is prohibited by O.C.G.A. Section  
9 15-14-37(a) and (b) or Article 7.C. of the Rules and  
10 Regulations of the Board for the taking of this  
11 proceeding.

12 There is no contract to provide reporting  
13 services between myself or any person with whom I  
14 have a principal and agency relationship nor any  
15 attorney at law in this action, party to this action,  
16 party having a financial interest in this action, or  
17 agent for an attorney at law in this action, party to  
18 this action, or party having a financial interest in  
19 this action. Any and all financial arrangements  
20 beyond my usual and customary rates have been  
21 disclosed and offered to all parties.

22 DATED: September 23, 2021.

23 

24 CHARLENE M. HANSARD, CCR-B-2341  
25

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1 To:  
2 Cary Ichter, Esq.  
3 Ichter Davis, LLC  
3340 Peachtree Road, N.E.  
Suite 1530  
4 Atlanta, Georgia 30326  
(404) 869-7600  
5 cichter@ichterdavis.com  
6 Re: Signature of Deponent  
7 Date Errata due back at our offices: 30 days  
8  
9 Greetings:  
10 The deponent has reserved the right to read and sign.  
Please have the deponent review the attached PDF  
transcript, noting any changes or corrections on the  
attached PDF Errata. The deponent may fill out the  
Errata electronically or print and fill out manually.  
11  
12 Once the Errata is signed by the deponent and  
notarized, please mail it to the offices of Veritext  
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13  
14 When the signed Errata is returned to us, we will  
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the original transcript. We will also send copies of  
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15 If the signed Errata is not returned within the time  
above, the original transcript may be filed with the  
court without the signature of the deponent.  
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Roswell, GA 30076  
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25

## ERRATA

I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that

There are no changes noted.

The following changes are noted:

Pursuant to Rule 30(7)(e) of the Federal Rules of Civil Procedure and/or OCGA 9-11-30(e), any changes in form or substance which you desire to make to your testimony shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any such corrections, please use the form below. If additional pages are necessary, please furnish same and attach.

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### **Reason for change**

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17 \_\_\_\_\_

18 Reason for change \_\_\_\_\_

19 \_\_\_\_\_

20 WILLIAM EDWARD DIGGES, III

21 Sworn to and subscribed

22 before me this \_\_\_\_ day

23 of \_\_\_\_\_, \_\_\_\_\_.  
\_\_\_\_\_

24 NOTARY PUBLIC

25 My Commission Expires: \_\_\_\_\_

[& - action]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**DEFENDANTS' NOTICE TO TAKE THE DEPOSITION OF  
PLAINTIFF WILLIAM DIGGES, III**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Defendants Brad Raffensperger, et al., will take the oral examination under oath of Plaintiff William Digges, III on Thursday, September 23, 2021, beginning at 10:00 a.m. and continuing thereafter until completed via Zoom videoconferencing through Veritext Legal Solutions. Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other

**Exhibit  
WD 0001**  
William Digges

purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

This 3<sup>rd</sup> day of September, 2021.

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*Attorneys for State Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 3, 2021, I caused to be served the foregoing **DEFENDANTS' NOTICE TO TAKE THE DEPOSITION OF PLAINTIFF WILLIAM DIGGES, III** by email to the following:

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This 3<sup>rd</sup> day of September, 2021.

/s/ Bryan P. Tyson  
Bryan P. Tyson  
Georgia Bar No. 515411  
btyson@taylorenglish.com

Inquiry &gt; Voter Registration

## Inquiry - View Voter Registration

Voter Information		Residence Address		Voting Districts	
Voter Name:	WILLIAM EDWARD DIGGES III	Street No.:	[REDACTED]	Congressional	006
Date of Birth:	[REDACTED] 1950	Street Name:	[REDACTED]	Senate	032
Race:	WHITE NOT OF HISPANIC ORIGIN	Suffix:		House	044
Gender:	MALE	Apt/Unit:		Judicial	COBB
Voter Registration #:	03514314	Address Line 2:		County Districts	
Registration Date:	01/23/1996	Municipality:		Commission	3
Current Status:	ACTIVE	Postal City:	MARIETTA	School	4
Status Reason:		County:	COBB	Municipal Districts	
Voter Phone:		Zip Code:	30066 - 3479	County Precinct:	BW01
E-mail:		State:	GA	Municipal Precinct:	-
DL #/State ID:	[REDACTED]	Added Date:	02/16/1996	Voting Area/Combo #:	00605
Site ID / Location:	01 - DDS	Change/Audit Date:	01/06/2021	County Polling Place:	NORTHEAST COBB COMMUNITY CENTER-BW01 3100 JAYCEE DR MARIETTA, GA 30066 - 0000
SSN (Full OR Last 4 Digits):	[REDACTED]	Date of Last Contact:	01/05/2021	Municipal Polling Place:	
ID Required:	NO	Date of Last Status Change:	03/02/2006		
US Citizen:	YES	Poll Worker Interest:			
Challenged Elector:	NO				

VoteSafe: Display Actual Address Display Signature

**Exhibit**  
**WD 0002**

William Digges

## Mailing Address

Street No.: Apt/Unit:  
 Suffix: Mailing City:  
 Street Name / PO Box: Mailing State:  
 Address Line 2: Zip Code:

User Name	Date/Time	Memo
-----------	-----------	------

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
WILLIAM EDWARD DIGGES III	01/23/1996	03514314	[REDACTED] MARIETTA 30066 - 3479

## Previous Address:

Street No	Street Name	Apt/Unit	Suffix	Address Line 2	City	State	Zip Code
[REDACTED]	[REDACTED]				MARIETTA	GA	30062 - 3265

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
WILLIAM EDWARD DIGGES III	01/23/1996	03514314	[REDACTED] MARIETTA 30066 - 3479

Date	Election Type	Election Category	Ballot Type	Challenged	Challenged Reason	Challenged Status	Party	Counted Comments	County Vote Cast In
11/05/1996	GENERAL	STATE WIDE	Regular					Yes	COBB
11/03/1998	GENERAL	STATE WIDE	Regular					Yes	COBB
11/07/2000	GENERAL	STATE WIDE	Regular					Yes	COBB
11/05/2002	GENERAL	STATE WIDE	Regular					Yes	COBB
11/02/2004	GENERAL	STATE WIDE	Regular					Yes	COBB
11/07/2006	GENERAL	STATE WIDE	Regular					Yes	COBB
11/04/2008	GENERAL	STATE WIDE	Regular					Yes	COBB
12/02/2008	GENERAL ELECTION RUNOFF	STATE WIDE	Regular					Yes	COBB
11/02/2010	GENERAL	STATE WIDE	Regular					Yes	COBB
07/31/2012	SPECIAL ELECTION	STATE WIDE	Regular				N	Yes	COBB
11/06/2012	GENERAL	STATE WIDE	Regular					Yes	COBB
11/04/2014	GENERAL	STATE WIDE	Regular					Yes	COBB
11/08/2016	GENERAL	STATE WIDE	Absentee					Yes	COBB
04/18/2017	SPECIAL ELECTION	STATE WIDE	Absentee					Yes	COBB
05/16/2017	RUNOFF	STATE WIDE	Absentee					Yes	COBB
06/20/2017	SPECIAL ELECTION	STATE WIDE	Absentee					Yes	COBB
05/22/2018	GENERAL PRIMARY	STATE WIDE	Absentee					DEMOCRAT Yes	COBB
07/24/2018	GENERAL PRIMARY RUNOFF	STATE WIDE	Absentee					DEMOCRAT Yes	COBB
11/06/2018	GENERAL	STATE WIDE	Absentee					Yes	COBB
12/04/2018	GENERAL ELECTION RUNOFF	STATE WIDE	Absentee					Yes	COBB
03/24/2020	PPP	STATE WIDE	Absentee					DEMOCRAT Yes	COBB
06/09/2020	GENERAL PRIMARY	STATE WIDE	Absentee					DEMOCRAT Yes	COBB
08/11/2020	GENERAL PRIMARY RUNOFF	STATE WIDE	Absentee					DEMOCRAT Yes	COBB

11/03/2020 GENERAL 01/05/2021 GENERAL ELECTION RUNOFF	STATE WIDE STATE WIDE	Absentee Absentee	Yes Yes	COBB COBB
---	--------------------------	----------------------	------------	--------------

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
WILLIAM EDWARD DIGGES III	01/23/1996	03514314	[REDACTED] MARIETTA 30066 - 3479

Change/Audit Date - Time	Action	Type of Change	Date of Last Contact	Change Reason	County	Changed User ID	Site ID/Location
01/06/2021 4:49 AM	NO CHANGE	Other	01/05/2021	DDS AUTOMATIC UPDATE	SYSTEM	01 - DDS	
12/17/2020 8:01 AM	CHANGE	Other	12/17/2020	ABSENTEE BALLOT	COBB	033KDEAKINS	
12/03/2020 8:01 AM	CHANGE	Other	12/03/2020	ABSENTEE BALLOT	COBB	033TPERRY	
12/03/2020 8:00 AM	CHANGE	Other	12/03/2020	ABSENTEE BALLOT	COBB	033TPERRY	
10/02/2020 4:01 PM	CHANGE	Other	10/02/2020	ABSENTEE BALLOT	COBB	033CSANDERS	
07/23/2020 1:02 PM	CHANGE	Other	07/23/2020	ABSENTEE BALLOT	COBB	033NWHITNEY	
05/14/2020 3:05 PM	CHANGE	Other	05/14/2020	ABSENTEE BALLOT	COBB	033UFOURF	
03/26/2020 10:02 AM	CHANGE	Other	03/26/2020	ABSENTEE BALLOT	COBB	033MCAMP	
02/28/2020 11:57 AM	CHANGE	Other	02/28/2020	ABSENTEE BALLOT	COBB	033PDOUGHTEN	
02/17/2020 1:49 PM	CHANGE	Other	02/17/2020	ABSENTEE BALLOT	COBB	033MCAMP	
02/17/2020 12:41 PM	CHANGE	Other	02/17/2020	ABSENTEE BALLOT	COBB	033EANDREWS	
11/29/2018 2:24 PM	CHANGE	Other	11/29/2018	ABSENTEE BALLOT	COBB	033PDOUGHTEN	
11/14/2018 3:18 PM	CHANGE	Other	11/14/2018	ABSENTEE BALLOT	COBB	033PYOUNG	
10/17/2018 3:12 PM	CHANGE	Other	10/17/2018	ABSENTEE BALLOT	COBB	033JHARP	
09/18/2018 12:03 PM	CHANGE	Other	09/18/2018	ABSENTEE BALLOT	COBB	033EANDREWS	
06/27/2018 2:05 PM	CHANGE	Other	06/27/2018	ABSENTEE BALLOT	COBB	033SCAROLINA	
06/11/2018 8:03 AM	CHANGE	Other	06/11/2018	ABSENTEE BALLOT	COBB	033PCHURCHILL	
05/21/2018 2:03 PM	CHANGE	Other	05/21/2018	ABSENTEE BALLOT	COBB	033JMAYES	
05/10/2018 2:49 PM	CHANGE	Other	05/10/2018	ABSENTEE BALLOT	COBB	033JDOBBS	
05/10/2018 10:22 AM	CHANGE	Other	05/10/2018	ABSENTEE BALLOT	COBB	033EANDREWS	
05/15/2017 9:38 AM	CHANGE	Other	05/15/2017	ABSENTEE BALLOT	COBB	033MFIELDS	
05/12/2017 11:29 AM	CHANGE	Other	05/12/2017	ABSENTEE BALLOT	COBB	033PDOUGHTEN	
05/03/2017 7:53 AM	CHANGE	Other	05/03/2017	ABSENTEE BALLOT	COBB	033EANDREWS	
05/02/2017 10:26 AM	CHANGE	Other	05/02/2017	ABSENTEE BALLOT	COBB	033DROSS	
04/08/2017 1:47 PM	CHANGE	Other	04/08/2017	ABSENTEE BALLOT	COBB	033CROGERS	
10/31/2016 7:05 PM	CHANGE	Other	10/31/2016	ABSENTEE BALLOT		033MREEL	
11/20/2014 9:13 PM	CHANGE	Other	11/04/2014	Express Poll In		SJACKSON	
11/06/2012 12:00 AM	NEW VOTER		11/06/2012	CON		ENETCONV	01 - DDS

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
WILLIAM EDWARD DIGGES III	01/23/1996	03514314	[REDACTED] MARIETTA 30066 - 3479

Notice Type	Date Sent	Response Date	Comments	Letter
REGISTRATION	01/06/2021		REGISTRATION	[REDACTED]

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
WILLIAM EDWARD DIGGES III	01/23/1996	03514314	[REDACTED] MARIETTA 30066 - 3479

Date of Cancellation	Status	Reject/Cancelled Reason	Comments
			Previous

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,** )  
                                  )  
Plaintiffs,                 )  
                                  )  
vs.                            )  
                                  )  
**BRAD RAFFENSPERGER,** )  
ET AL.,                     )  
                                  )  
Defendants.                 )

**CIVIL ACTION**

**FILE NO. 1:17-cv-2989-AT**

**COALITION PLAINTIFFS' STATEMENT  
ON WILLIAM DIGGES**

The Coalition Plaintiffs submit this Statement in response to this Court's direction in its July 2, 2019 Order:

As the Coalition Plaintiffs have indicated that Plaintiff William Digges III, who has substantial database experience, was expected to lead the Coalition Plaintiffs' review of the database, the Court DIRECTS the Coalition Plaintiffs to identify and explain in detail the nature of Mr. Digges expertise, employment, and his expected role in the review.

(Doc. 446 at 3).

**Exhibit  
WD 0003  
William Digges**

### **A. Mr. Digges Database Experience and Expertise**

Mr. Digges retired from IBM in 2010 after 32 years and has 25 years experience working with databases, including Microsoft Access, DB/2 and SQL. Mr. Digges has a Master of Science in Computer Information System, Regis University, and a Bachelor of Science from Fairleigh Dickenson University. His range of responsibilities for IBM, and other employment information, is described in his resume, attached hereto as Exhibit A.

### **B. Mr. Digges' Knowledge of GEMS databases**

Mr. Digges also is familiar with GEMS databases. Mr. Digges has reviewed the structure and operation of the 2001 and 2002 GEMS databases from Hall County and Cobb County, Georgia. These databases are in the public domain.<sup>1</sup> He has also reviewed GEMS databases in the public domain including large post-election databases from Pima County, Arizona, and Marin County, California, which have the same file layout as the referenced Georgia's Hall County and Cobb County databases.

### **C. Mr. Digges' Anticipated Role**

Mr. Digges will work with attorneys and experts in their review of non-confidential data contained in the GEMS databases and will lead the team of less-

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<sup>1</sup> <http://blackboxvoting.org/docs/diebold/marks-gems-files.zip>

experienced analysts in their labor-intensive clerical review of the voluminous data in the databases frequently comparing that data to citizen-collected polling place documents.

The timing of Mr. Digges' involvement will depend in part upon the relief granted by this Court. Plaintiffs originally proposed that the GEMS database be produced without any confidentiality restrictions since the data is not confidential and the structure of the database is no different than the structure of other jurisdictions' databases which are already in the public record. (Doc. 441). If the Court orders the GEMS databases to be produced without restriction, Mr. Digges work will begin immediately upon receipt of the databases.

In Plaintiffs' modified proposal, set forth in its July 3, 2019 filing (Doc. 451), the GEMS databases would first be reviewed only by Plaintiffs' attorneys and experts. If the attorneys and experts identify non-confidential information that can be extracted from the databases for review by other non-lawyer, non-expert members of Plaintiffs' teams, they will identify that information to Defendants, who will have 24 hours to raise an objection. If no objection is raised, or if the objection is rejected by the Court, the Plaintiffs' attorneys or expert will provide the non-confidential information to the members of Plaintiffs' teams which, for the Coalition Plaintiffs, will be led by Mr. Digges.

Respectfully submitted this 5<sup>st</sup> day of July, 2019.

/s/ Bruce P. Brown  
Bruce P. Brown  
Georgia Bar No. 064460  
BRUCE P. BROWN LAW LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

/s/ Robert A. McGuire, III  
Robert A. McGuire, III  
Admitted Pro Hac Vice  
(ECF No. 125)  
ROBERT MC GUIRE LAW FIRM  
113 Cherry St. #86685  
Seattle, Washington 98104-2205  
(253) 267-8530

*Counsel for Coalition for Good Governance*

/s/ Cary Ichter  
Cary Ichter  
Georgia Bar No. 382515  
ICHTER DAVIS LLC  
3340 Peachtree Road NE  
Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600

*Counsel for William Digges III, Laura Digges, Ricardo Davis and Megan Missett*

**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ Bruce P. Brown*  
Bruce P. Brown

**CERTIFICATE OF SERVICE**

This is to certify that I have this day caused the foregoing to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 5<sup>th</sup> day of July, 2019.

*/s/ Bruce P. Brown*  
Bruce P. Brown

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A

## William E. Digges

3478 Chastain Glen Ln NE  
Marietta, GA 30066

Cell: 678-429-3729  
wdigges@gmail.com

### SUMMARY

Financial professional with knowledge of a broad range of corporate financial operations and processes. Experienced in corporate headquarters, plant hardware or software manufacturing, and marketing environments. Business oriented expertise with financial databases and IT for analysis, process improvement, development and reporting purposes.

### PROFESSIONAL EXPERIENCE

#### **Kennesaw State University, Kennesaw, GA**

**Professional Accountant IV - (08/13 – 05/19)** – Responsible for total unit consolidated reporting and revenue, expense, financial planning and analysis for Card Services, Copy Print, ASaP Admin, Parking Services, and Student Health Services units.

**Professional Accountant IV - (01/10 – 08/13)** – Responsible for revenue, expense, financial planning and analysis for all food (9) venues on campus. Includes monthly close, actual to plan analysis statements and forecasting.

#### **IBM Corporation, Atlanta, GA**

##### **Senior Information Analyst – (2007 – 2010)**

Designed, prepared and analyzed sales leads and forecast reports for Eastern USA and Canadian regional marketing executives.

- Designed, reconciled, analyzed and distributed weekly sales forecast metrics in Excel spreadsheets to marketing, sales executives to measure sales progress.
- Used large data warehouse to provide custom opportunity analysis reports for sales executives, which assisted in improving sales metrics.
- Created custom reports for operations executives that resolved systemic record errors.

##### **Senior Business Analyst, IT – (2006 – 2007)**

Teamed with IT to develop and implement standard financial metrics reports for commission based sales representatives in a worldwide marketing environment.

Created detailed metrics reports to measure all worldwide commissioned individuals against sales quotas. Presented with the IBM Bravo Award for achievement.

- Led sales reporting standardization initiative, which consolidated commissions reporting, eliminating previous inconsistent reporting system.
- Initiated a project to improve IP data communications with a Latin American support unit that improved productivity.

##### **Senior Business Analyst – (1996 – 2007)**

Prepared and analyzed marketing revenue and gross profit report for executives using Excel in a data warehouse environment. Answered numerous inquiries from management and prepared reports as requested. Created and ran standard procedures for weekly and monthly reporting (100+ reports to 70+ Managers). Polled data warehouses for sales revenue information and consolidated the results for executive reporting.

Granted, IBM Leadership Award for overall performance.

- Mentored three employees and others in System and Database reporting techniques as required.
- Team Lead for nationwide field sales commissions reporting projects which streamlined the reporting process.
- Team Member on project for internal eBusiness initiative using a WEB based intranet portal for revenue and gross profit reporting to Sales Teams.
- Participated in a data mart server project, which provided processing efficiencies for geographic views of sales revenue using a database.

### **Senior Accountant – (1993 – 1996)**

Developed and maintained billing system for a Software & Publications unit. Created activity based cost center process for a Software & Publications unit. Distributed and controlled cost center records via inter-company network to the ledger consolidation system. A finance representative on software billing and distribution system development team, ensuring that system requirements for costing and billing were met. Duties included preparing algorithms, testing, designing SQL tables and setting up a test environment for network transactions.

### **OTHER IBM EXPERIENCE – (1977-1993)**

#### **Cost Accounting**

Controlled and calculated cost center Software unified billing rates for distribution to other inter-company units via network. Maintained and improved software cost and delivery, billing system.

#### **Staff Financial Planning – Plant Administration/Operations**

Created and measured plant facility organizations to budget for plant operations units.

#### **Systems Analyst – Property Control**

Responsible for the design, installation and maintenance of a networked asset control system which replaced a paper based system improving asset tracking.

Maintained manufacturing plant system tables for plant operating expense.

#### **International Accounting**

Finance team member executing the transfer and remote operation of a World Trade ledger operation from NY to CO. Designed and implemented the networked transfer of \$1 billion in goods and services ledger from International unit to USA domestic ledgers for efficient consolidation of worldwide accounts.

#### **Ledger and Balance Sheet Accounting**

Processed, reconciled and distributed plant ledger and balance sheet information for \$300 million manufacturing operation via an inter-company network.

#### **Division HQ Accounting**

Measured, analyzed and consolidated product development expense to budget for five plant sites to headquarters unit.

#### **Accounting, General & Administrative Expense**

Balanced and controlled manufacturing expense accounts for consolidation to headquarters unit.

### **EDUCATION**

**MS**, Computer Information Systems, Regis University, Denver, CO, 1995

Finance & Information Systems (36 Graduate credits), Pace University, White Plains, NY, 1984

**BS**, Accounting, Fairleigh Dickenson University, Teaneck, NJ, 1982

### **TECHNICAL SKILLS**

Windows 7-10, Excel, Microsoft Word, PowerPoint, Microsoft Office, Access, DB/2, QMF, SQL, BRIO, Hyperion Explorer, PeopleSoft, SAS, and advanced PC user.

IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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DONNA CURLING, et al. )  
Plaintiff, )  
vs. ) CIVIL ACTION FILE NO.: 1:17-cv-  
BRIAN P. KEMP, et al. ) 2989-AT  
Defendant. )  
)

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**DECLARATION OF WILLIAM DIGGES III**

**WILLIAM DIGGES III** hereby declares as follows:

1. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.
2. I am a Georgia voter, registered to vote at my residence [REDACTED]  
[REDACTED]
3. I am a member of the Coalition for Good Governance.
4. I will be voting in the upcoming March 24, 2020, primary election; any other elections that might be scheduled for the first quarter of 2020, such as to fill vacancies, and plan to vote in all future elections for which I am eligible to vote. I vote in every election, of which I am aware that I can participate.

5. I plan to vote by absentee mail ballot in the upcoming elections because hand marked paper ballots will not be issued at the polling places in Cobb County on Election Day.
6. My definite preference is to vote on Election Day at my local precinct with my community and participate in the community experience, also with the benefit of the latest information on matters on the ballot.
7. I wish to cast a secure ballot that reflects my intent, but this is impossible to do by voting on the Ballot Marking Devices Cobb County plans to use in their polling places. This is because the BMDs would print my vote as an encoded barcode, which I cannot read and cannot verify before casting my vote.
8. Additionally, I am aware of the systemic problems of the electronic pollbooks during the November 2018 elections and prior elections. And I am aware that those systemic problems caused people to be sent to the wrong polling place, or be denied a ballot, or be forced to vote provisionally.
9. To ensure that I can verify my vote before casting it, and to avoid the risk of being turned away from my polling station due to electronic pollbook malfunctions, I am making the unfortunate choice to vote several days prior to Election Day by mail ballot, and unhappily giving up the benefits of voting in the polling place with my friends and neighbors.

10.I understand that I must mail or deliver my mail ballot several days before Election Day in order to confirm that it is delivered and approved in time for me to cure possible delivery failure or any technical deficiencies in the signature match or oath information details. Although this is a serious disadvantage in casting my ballot before Election Day, I will reluctantly accept this voting disadvantage for the benefit of casting a paper ballot that can be recounted and audited.

11.It is my understanding that the Dominion ImageCast ballot scanners record timestamps and other metadata with the scanned ballot images in a way that could be later be used to identify my ballot and who I voted for. I greatly value my private vote, especially where my vote might be different from friends or peers. I also do not want hackers, political campaigns, or elected officials having access to the electronic record of my ballot, which they can connect back to me. If I voted in person, I would have to cast my ballot using one of these scanners, and would thus put the secrecy of my ballot at risk.

12.I also understand that when I vote by mail, my ballot is bulk- scanned with many others, and so any timestamps the scanners create could not be used to connect my ballot back to me. My decision to vote by mail is thus also

forced on me because I believe it is the only way to protect my right to a secret ballot.

I declare under penalty of perjury in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this date, October 20, 2019

William Digges III  
William Digges III

IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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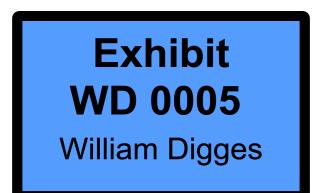
DONNA CURLING, et al.	)	
Plaintiff,	)	
vs.	)	CIVIL ACTION FILE NO.: 1:17-cv-
BRIAN P. KEMP, et al.	)	2989-AT
Defendant.	)	
	)	

---

**DECLARATION OF WILLIAM DIGGES III**

WILLIAM DIGGES III hereby declares as follows:

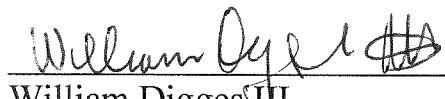
1. I am a Georgia voter, registered to vote at my residence 3478 Chastain Glen Lane NE, Georgia 30066.
2. I will be voting in the November 6, 2018 election and plan to vote in all future elections for which I am eligible to vote. I vote in every election of which I am aware that I can participate.
3. I plan to vote by absentee mail ballot in the November 6, 2018 because paper ballots will not be issued at the polling places in Cobb County on Election Day.
4. My definite preference is to vote on Election Day at my local precinct with my community and participate in the community experience, also with the benefit of the latest information on matters on the ballot.



5. I wish to cast a secure ballot that I reflects my intent, but this is impossible to do by voting on the DREs provided by Cobb County in the polling places. Therefore, I am making the unfortunate choice to vote several days prior to Election Day by mail ballot, and unhappily giving up the benefits of voting in the polling place.
6. I understand that I must mail or deliver my mail ballot several days before Election Day in order to confirm that it is delivered and approved in time for me to cure possible delivery failure or any technical deficiencies in signature match or oath information details.
7. Although this is a serious disadvantage in casting my ballot before Election Day, I will reluctantly accept this voting disadvantage for the benefit of casting a paper ballot that can be recounted and audited.

I declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this date, September 27, 2018

  
\_\_\_\_\_  
William Digges III

1. CGG speaks for members on policy issues such as the recent appearance before the State Election Board on rulemaking related to SB202; CGG speaks for me on election bills in the General Assembly and I use their expertise analyzing the bills for me.
2. Educates members and the public regarding the impact of laws on election integrity and voting;
3. Responds to inquiries regarding the mechanics and logistics of elections;
4. Has involved members in assisting with high-touch aspects of litigation support;
5. Has involved members in lobbying for election law reform;
6. Creates and disseminates press release on public interest topics related to election integrity and reform.

BMD=new

- MACHINES ARE INSECURE
- SUBJECT TO BEING HACKED
- NOT TRUSTWORTHY

Privacy  
Big Screens  
Bar  
QR Codes

DR Haldeman  
Show me does when not to

Exhibit  
**WD 0006**  
William Diges